

**UNITED STATES BANKRUPTCY COURT
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA**

In Re: :
ERIN M. MYERS : Bankruptcy No. 5:23-bk-00215
Debtor :
: Chapter 7

**MOTION TO AVOID JUDICIAL LIEN
OF SCHUYLKILL HAVEN BOROUGH**

Debtor, by and through her attorney, Robert M. Reedy, Esquire, hereby move this Honorable Court to avoid the judicial lien of Schuylkill Haven Borough and in support thereof avers as follows:

1. This case was commenced by the filing of a Voluntary Petition for Relief under Chapter 7 of Title 11 of the United States Bankruptcy Code on February 1, 2023.
2. On October 4, 2017, Schuylkill Haven Borough, (“Creditor”) obtained Judgment against the Debtor, in the matter of Schuylkill Haven Borough vs. Erin M. Nevadomsky, n/k/a/Erin M. Myer, in the Schuylkill County Court of Common Pleas No. J-4822-2017.
3. Debtor is entitled to the exemptions claimed on Schedule “F” filed in this case.
4. The exemptions of the Debtor is impaired by the lien set forth above.
5. Debtor alleges that the lien of the Creditor is avoidable, in its entirety, pursuant to 11 U.S.C. Section 522(f)(1).

WHEREFORE, Debtor prays that this Honorable Court enter an Order avoiding the lien of the Creditor in its entirety.

Date

Respectfully submitted,
/s/
Robert M. Reedy, Esquire
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**UNITED STATES BANKRUPTCY COURT
MIDDLE DISTRICT OF PENNSYLVANIA**

In re: Debtor name(s) used by the Debtor(s) in the last eight (8) years, including married, maiden, and trade names:

ERIN M. MYERS,

Chapter 7

Debtor

Case number: 5:23-bk-00215

ERIN M. MYERS,

Matter: Motion to Avoid Judicial Lien

Movant

vs.

SCHUYLKILL HAVEN BOROUGH,

Respondent

NOTICE

NOTICE OF OPPORTUNITY TO OBJECT AND HEARING: Pursuant to Local Rule 2002-1(a), the Court will consider this Motion, objection or other matter without further notice or hearing unless a party in interest files an objection/response within twenty-one (21) days of the date of this Notice. If you object to the relief requested, you must file your objections/response with the Clerk, U.S. Bankruptcy Court, 274 Max Rosenn U.S. Courthouse, 197 South Main Street, Wilkes-Barre, Pennsylvania 18071, and serve a copy on the movant and movant's attorney, if one is designated.

If you file and serve an answer, objection, or other response within the time permitted, the Court may schedule a hearing and you will be notified. If you do not file an objection within the time permitted, the Court will deem the motion unopposed and proceed to consider the Motion without further notice or hearing, and may grant the relief requested.

Date: March 20, 2023

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